

Shawn R. Perez, Esq.
Nevada Bar No. 10421
Law Offices of Shawn R. Perez
7121 W. Craig Road, #113-38
Las Vegas, Nevada 89129
(949) 492-9545 Telephone
(702) 485-3977 Telephone
shawn711@msn.com

Ariel Mitchell, Esq. (*pro hac vice*)
The Law Office of Ariel Mitchell, P.A.
500 NW 2nd Ave. #12864
Miami, FL 33101
Tel: (305) 903-5835
ariel@arielesq.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

ASHLEY PARHAM, et. al

Plaintiffs,

v.

SEAN COMBS, et. al.

Defendants.

Case No.: 3:24-cv-07191-RFL

**DECLARATION OF
SHAWN PEREZ IN
SUPPORT OF THE
ADMINISTRATIVE
MOTION TO SEAL**

DECLARATION OF SHAWN PEREZ

I, Shawn Perez, declare:

1. I am an attorney at law, licensed to practice before all Courts of the State of California and before this Court. I have been retained by Plaintiffs in connection with the above-captioned action. I make this Declaration in support of Plaintiffs Administrative Motion to Seal.

1 2. On August 19, 2025, this Court entered an Order denying Defendant Desbordes
2 motion for sanctions and required Plaintiffs show cause as to basis of Plaintiffs
3 intent to proceed against Defendant.¹

4 3. On August 20, 2025, this Court entered an Order required Plaintiffs show cause
5 regarding service of Defendants.²

6 4. [REDACTED]
7
8

9 5. [REDACTED]
10
11
12

13 6. [REDACTED]
14

15 7. [REDACTED]
16
17
18
19
20

21 8. [REDACTED]
22
23
24

25
26
27 ¹ ECF 54

28 ² ECF 55

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

9. [REDACTED]

10. [REDACTED]

11. [REDACTED]

12. [REDACTED]

13. [REDACTED]

14. [REDACTED]

15. [REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 14, 2025, in Las Vegas, Nevada.

/s/ Shawn Perez